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Honorable Mary Alice Theiler

JUL 29 2019

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PARK QUAN,

Defendant.

Case No. MJ19-343

COMPLAINT FOR VIOLATION OF
18 U.S.C. § 922(g)(1)

Before, the Honorable Mary Alice Theiler, United States Magistrate Judge, United States Courthouse, 700 Stewart Street, Seattle, Washington.

COUNT 1
(Felon in Possession of Firearm)

On or about July 29, 2019, in King County, within the Western District of Washington, PARK QUAN, knowing that he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year, to wit:

1 a. *Felon in Possession of Explosives*, Case No. CR83-00039, in the U.S.
2 District Court for the Western District of Washington, on or about
3 November 4, 1983;
4 did knowingly possess, in and affecting interstate and foreign commerce, the following
5 firearm:

6 a. Bushmaster Model XM15-E23 .223 Remington caliber rifle, with serial
7 number L435132;

8 which had been shipped and transported in interstate and foreign commerce.

9 All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

10
11 The undersigned complainant being duly sworn states:

12 1. I, Joel Martini, am a Special Agent with the Federal Bureau of Investigation
13 (FBI), currently assigned to the Seattle Field Office, and have been so employed since
14 January 2017. I am assigned to the Cyber Squad, where I investigate computer intrusions
15 and other cybercrimes. Prior to my employment as a Special Agent, I worked as a
16 Computer Forensic Examiner for the FBI for approximately five years. The facts set
17 forth in this Complaint are based upon my personal knowledge, information I have
18 received from others during the course of my investigation, and my review of relevant
19 documents.

20 2. The FBI is conducting an investigation into a network intrusion and data
21 breach. As part of that investigation, the FBI identified an individual believed to have
22 committed the intrusion and further identified that suspect's residence as an address in
23 Seattle, Washington, the Subject Residence, which is located within the Western District
24 of Washington.

25 3. Multiple individuals were believed to reside at the Subject Residence,
26 including, according to public records, the property owner, PARK QUAN.

27 4. On July 29, 2019, agents conducted a search of the Subject Residence
28 pursuant to a search warrant issued by the Honorable Mary Alice Theiler, in relation to

1 the investigation of the network intrusion.

2 5. Approximately five individuals, including PARK QUAN and the network
3 intrusion suspect, were present in the residence. For officer safety, the residents were
4 detained and secured pending execution of the search.

5 6. The Subject Residence contained three bedrooms. When sweeping the
6 residence, agents observed in plain view multiple firearms and a gun safe in the bedroom
7 believed to belong to PARK QUAN based on observations of the room. Agents observed
8 approximately twenty (20) firearms in PARK QUAN's bedroom, including what
9 appeared to be an AR15-style assault rifle, an AK47-style assault rifle, and handguns;
10 firearm accessories, including bump stocks,¹ scopes, and grips; ammunition; and gun
11 powder. Agents also encountered what appear to be fake grenades within the bedroom.

12 7. PARK QUAN was provided his *Miranda* warnings and agreed to speak to
13 agents. During that interview, PARK QUAN acknowledged that the firearms and bump
14 stocks belonged to him, as did the bedroom in which the weapons were observed. PARK
15 QUAN further explained that he typically purchased firearms from private sellers and
16 that he acquired the bump stocks before they were made illegal. PARK QUAN also
17 stated that he had a prior felony conviction and was aware that he was prohibited from
18 possessing such items.


19 8. An agent from the Bureau of Alcohol, Tobacco, Firearms and Explosives
20 (ATF) observed and photographed some of the firearms observed in PARK QUAN's
21 bedroom. The ATF agent thereafter further consulted with ATF Special Agent Catherine
22 Cole, specially trained and designated regarding interstate nexus firearm examination,
23 who preliminarily concluded that at least one of the firearms, a Bushmaster Model
24 XM15-E23 .223 Remington caliber rifle, with serial number L435132, was not
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26

27
28 ¹ Bump stocks, or bump fire stocks, are gun stocks that can be used to assist in bump firing, which is the act of
using the recoil of a semi-automatic firearm or double-action revolver to fire ammunition cartridges in rapid
succession, but with a loss of accuracy.

1 manufactured in the State of Washington, and thus its presence in Washington indicates it
2 traveled in interstate commerce.

3 9. I have reviewed court records from the U.S. District Court for the Western
4 District of Washington, that show that PARK QUAN was convicted of the felony offense
5 of Felon in Possession of Explosives, under Case No. CR83-00039, on or about
6 November 4, 1983, and received a sentence of 120 months. According to NCIC records
7 that I have reviewed, PARK QUAN also appears to have a prior federal conviction for
8 the unlawful possession of a firearm (an unregistered machine gun), out of Texas, on or
9 about May 23, 1991, for which he was sentenced to 57 months. Investigators are in the
10 process of obtaining court records related to that criminal matter as well.

11 10. Based on the foregoing, I submit that probable cause exists to believe that
12 PARK QUAN has committed a violation of Title 18, United States Code,
13 Section 922(g)(1).

14
15 
16 JOEL MARTINI, Complainant
17 Special Agent
18 Federal Bureau of Investigation

19 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
20 presence, I hereby find that there is probable cause to believe the defendant committed
21 the offense set forth in the Complaint.

22 Complaint and affidavit sworn to me before this 29 day of July, 2019.

23
24 
25 MARY ALICE THEILER
26 United States Magistrate Judge
27
28